REMARKS

Claims 1-22 are pending in the application. Claims 1-3 and 5-22 are withdrawn from consideration. Claims 23-28 have been added to the application and are currently presented for examination.

The examiner has rejected claim 4 under 35 U.S.C. § 102(a) as being anticipated by AAPA (Applicant's Admitted Prior Art), as arguing that Fig. 31 of applicant's specification illustrates the concept of encoding. However, Fig. 31 does not teach suggest prediction in a macro-block unit composed of (n x n) pixels, of a top field of a picture frame from either one of top and bottom fields of a forward picture frame, and a bottom field of the picture frame from either one of top and bottom fields of a backward picture frame, which is specified in the presently claimed invention.

The following diagram (Diagram I) indicates a current picture frame positioned between forward and backward picture frames, and each picture frame comprises top and bottom fields, which respectively includes odd numbers and even numbers of pixel scanning lines.
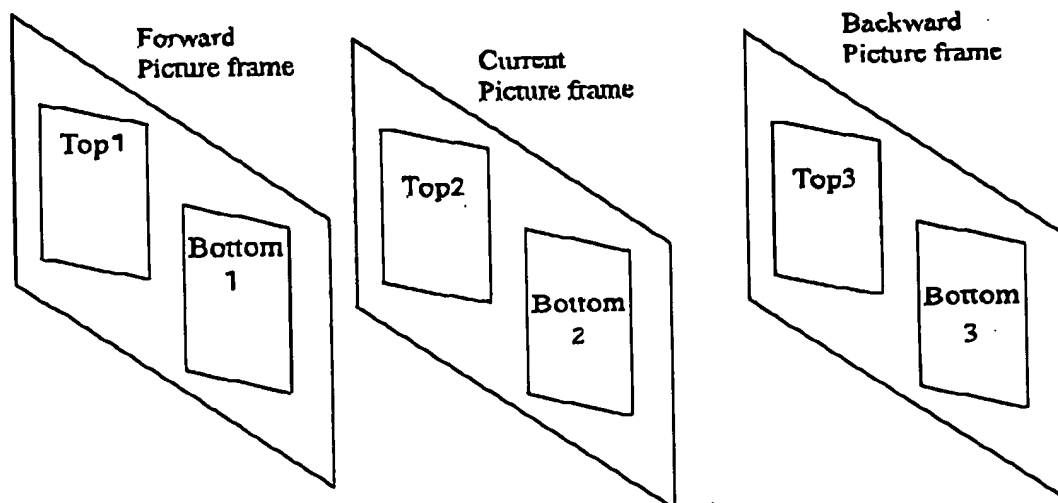
<u>Diagram I</u>

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Fig. 31 of the applicant's specification explains that each field of the current picture frame is predicted by using both fields of the forward and backward picture frame. Namely, Top 2, picture field of odd scanning lines is predicted both from either one of Top 1 and Bottom 1 of the forward picture frame and either one of Top 3 and Bottom 3 of the backward picture frame. Furthermore, Bottom 2, picture field of even scanning lines is predicted both from either one of Top 1 and Bottom 1 of the forward picture frame and either one of Top 3 and Bottom 3 of the backward picture frame.
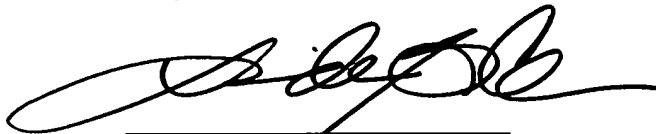
Accordingly, Fig. 31 specifies that both fields of Top 2 and Bottom 2 include predictive pictures combined with the forward and backward picture frames. As a result of this, if a scene change occurs between the Top 2 and Bottom 2 of the current frame, a predictive picture is deteriorated.

The present application solves this problem by having the feature of performing the prediction in a macro-block unit composed of (n x n) pixels, to the top field of the picture frame from either one of top and bottom fields of the forward picture frame, and the bottom field of the picture frame from either one of top and bottom fields of the backward picture frame, as shown in Fig. 1 of the applicant's specification.

In view of the remarks set forth, above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

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Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

Linda S. Chan
Reg. No. 42,400

CUSTOMER NUMBER 026304
Telephone: (212) 940-8703
Fax: (212) 940-8986/8987
Docket No.: FUJH 16.870 (100794-11371)
LSC:ES:fd

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